

LAW OFFICES OF HUGH JANOW, LLC
Hugh Janow, Esq. (HJ-3524)
One Blue Hill Plaza
10th Floor
Pearl River, NY 10965
Attorney for Defendant
Leonard Keff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	ECF Case
	:	
v.	:	<u>AFFIRMATION IN SUPPORT</u>
	:	
LEONARD T. KEFF,	:	07 Civ. 3549 (SCR)
	:	
Defendant.	:	
-----	X	

Hugh Janow, an attorney admitted to practice law in this state, affirms as follows under penalty of perjury:

1. That I am the attorney for the above-named defendant and as such am familiar with the facts and circumstances herein.

2. That almost immediately after being retained as counsel for the defendant in connection with the above-entitled lawsuit, the defendant became uncooperative with your affiant's efforts to pursue this case and has not always been candid with the information provided to your affiant.

3. That despite the aforementioned circumstances, this office has carried out its responsibilities by attempting to procure information from the defendant through repeated telephone calls and has attempted to conduct discovery before trial.

4. It is submitted that I have been unable to communicate with and work with the defendant.

5. Given the aforementioned circumstances, this office cannot adequately represent the defendant.

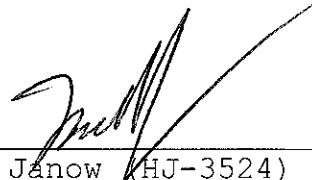
6. I have attempted to contact the defendant with respect to this motion to withdraw and have not been successful at contacting the defendant personally. As a result, I have left voice mail messages for the defendant informing him of my intent to withdraw and the Notice of Motion and this Affirmation will be served upon the defendant by mail.

WHEREFORE, it is respectfully submitted that it is in the best interest of the defendant that your affiant be permitted to withdraw as counsel.

I declare under penalties of perjury that the foregoing is true and correct.

DATED: Pearl River, New York
January 4, 2008

LAW OFFICES OF HUGH JANOW, LLC

By: 

Hugh Janow (HJ-3524)
One Blue Hill Plaza
10th Floor
Pearl River, NY 10965
(845) 735-8385
Attorney for Defendant

LAW OFFICES OF HUGH JANOW, LLC
Hugh Janow, Esq. (HJ-3524)
One Blue Hill Plaza, 10th Floor
Pearl River, NY 10965
Attorney for Defendant, Leonard Keff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

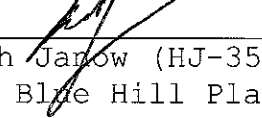
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UNITED STATES OF AMERICA, :
 :
Plaintiff, : ECF Case
 :
v. : **NOTICE OF MOTION**
 :
LEONARD T. KEFF, : 07 Civ. 3549 (SCR)
 :
Defendant. :
-----x

PLEASE TAKE NOTICE that on the ____ day of _____ 2008, at ____ a.m. or as soon thereafter as counsel can be heard, defendant's counsel, Hugh Janow, shall move before the Honorable Judge Stephen C. Robinson, U.S.D.J., United States Courthouse, Room ___, 300 Quarropas Street, White Plains, New York 10601, for an Order, pursuant to Rule 1.4 of the Local Rules of United States District Courts for the Southern and Eastern Districts of New York, granting him leave to withdraw as counsel for the defendant in the above-captioned case.

PLEASE TAKE FUTHER NOTICE that in support of this motion, counsel shall rely upon his affirmation submitted herewith.

DATED: Pearl River, New York
January 4, 2008

LAW OFFICES OF HUGH JANOW, LLC

By: 

Hugh Janow (HJ-3524)
One Blue Hill Plaza
10th Floor
Pearl River, NY 10965
(845) 735-8385

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) SS.:
COUNTY OF ROCKLAND)

VLADIMIR SPAKOVSKY, being sworn says: I am not a party to the action, am over 18 years of age and reside in Nyack, New York.

On January 4, 2008, I served a true copy of the annexed NOTICE OF MOTION and AFFIRMATION IN SUPPORT, dated January 4, 2008, in the following manner:

___ By delivering the same personally to the persons at the address indicated below:

X By mailing the same in a sealed envelope, with postage prepaid thereon, in a post-office or official depository of the U.S. Postal Service within the State of New York, addressed to the last-known address of the addressee(s) as indicated below:

___ By depositing the same with an overnight delivery service in a wrapper properly addressed. Said delivery was made prior to the latest time designated by the overnight delivery service for overnight delivery. The address and delivery service are indicated below:

Leonard T. Keff
20 Kings Point Lane
Washingtonville, NY 10992


VLADIMIR SPAKOVSKY

Sworn to before me on this
4th day of January, 2008


NOTARY PUBLIC

HUGH JANOW
NOTARY PUBLIC, STATE OF NEW YORK
NO. #02JA4977292
QUALIFIED IN ROCKLAND COUNTY
MY COMMISSION EXPIRES JAN. 28, 2011